

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") are filing a Motion to File Documents under Seal ("Motion"). In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum in Support of Plaintiffs' Motion to File Documents under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure Exhibits 1, 5–6, 12–31, 33–34, 36–38, 41, 43, 46, 49, and 51 to Plaintiffs' Cross Motion for Summary Judgment and Opposition to Defendants' Motion for Summary Judgment. A brief description of the content of these documents is as follows:

- Ex. 1: Confidential Waples Mobile Home Park tenant file review spreadsheet.

- Ex. 5: Confidential violation letter from Defendants to Felix Bolaños.
- Ex. 6: Confidential violation letter from Defendants to Herbert Saravia Cruz.
- Ex. 12: Resident Screening Report for Herbert Saravia Cruz.
- Ex. 13: Resident Screening Report for Jose Reyes.
- Ex. 14: Resident Screening Report for Esteban Moya.
- Ex. 15: CoreLogic credit reports for Herbert Saravia Cruz, Jose Reyes, Esteban Moya, and Felix Bolaños containing Social Security numbers and sensitive financial information.
- Ex. 16: Confidential excerpts from the deposition transcript of Felix Bolaños.
- Ex. 17: The “Application for Residency” of Herbert Saravia Cruz containing social security numbers, and other confidential information, such as the name and birth date of minors.
- Ex. 18: Confidential excerpts from deposition transcript of Herbert Saravia Cruz.
- Ex. 19: Confidential excerpts from the deposition transcript of Esteban Moya.
- Ex. 20: Confidential excerpts from the deposition transcript of Jose Reyes.
- Ex. 21: Excerpts from the deposition transcript of Defendants’ designated 30(b)(6) deponent.¹
- Ex. 22: Confidential letter from Defendants to residents regarding increase in month-to-month surcharge.
- Ex. 23: Confidential excerpts from the deposition transcript of Yovana Jaldin Solis.
- Ex. 24: Confidential excerpts from the deposition transcript of Rosa Amaya.

¹ Although Defendants did not mark their deposition transcripts as confidential, Plaintiffs file these transcripts under seal out of an abundance of caution.

- Ex. 25: Excerpts from the the deposition transcript of Albert Dwoskin.
- Ex. 26: Excerpts from the deposition transcript of Josephine Giambanco.
- Ex. 27: Excerpts from the deposition transcript of Carolina Easton.
- Ex. 28: Copy of Herbert Saravia Cruz's Social Security card.
- Ex. 29: Copy of Jose Reyes's Social Security card.
- Ex. 30: Copy of Esteban Moya's Social Security card.
- Ex. 31: Confidential copy of Felix Bolaños's Social Security card.
- Ex. 33: Confidential renewal letter from Defendants to Jose Reyes.
- Ex. 34: Confidential eviction letter from Defendants to Jose Reyes.
- Ex. 36: Confidential 2015-2016 lease agreement between Defendants and Esteban Moya.
- Ex. 37: Confidential 2015-2016 lease agreement between Defendants and Herbert Saravia Cruz.
- Ex. 38: Confidential "21/30" notice from Defendants to Jose Reyes.
- Ex. 41: Confidential Waples Mobile Home Park tenant file deficiency list.
- Ex. 43: Confidential Consumer Reports and CoreLogic SafeRent Training Manual.
- Ex. 46: Confidential 2014-2015 lease agreement between Defendants and Esteban Moya.
- Ex. 49: Confidential letter from VOICE, an interfaith coalition, to Defendants.
- Ex. 51: Tenant ledger for Jose Reyes, which contains a phone number and sensitive financial information.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

DATED this 23rd day of December, 2016 Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December, 2016, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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